

**From:** [Jenny Klika](#)  
**To:** [Benbow, Gene](#)  
**Subject:** RE: 61282-49 data comp issue  
**Date:** Tuesday, July 09, 2013 2:48:25 PM  
**Attachments:** [Section 3 Label \(61282-49\) 07-13.doc](#)  
[Section 3 Label \(61282-49\) 07-13.pdf](#)

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As you wish!! ☺

Question for you: Since our users are clamoring (loudly I might add) for this label, can we put together a Supplemental label just to use for the next 4 weeks while this new label is being printed? I fully realize I potentially would have to get that label cleared with local state agencies.

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**From:** Benbow, Gene [<mailto:Benbow.Gene@epa.gov>]  
**Sent:** Tuesday, July 09, 2013 1:44 PM  
**To:** Jenny Klika  
**Subject:** RE: 61282-49 data comp issue

Great – one more change:

1. On the front panel please change the brand name to “Prozap Zinc Phosphide Pellets”.

Once I can print a revise 1<sup>st</sup> page it will go from the printer directly to John’s desk for signature ;).

Thanks,

Gene Benbow  
Biologist, EPA  
Insecticides-Rodenticides Branch  
Registration Division  
<http://epa.gov/pesticides/>

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**From:** Jenny Klika [<mailto:JKlika@neogen.com>]  
**Sent:** Tuesday, July 09, 2013 2:34 PM  
**To:** Benbow, Gene  
**Subject:** RE: 61282-49 data comp issue

Hi Gene,  
Attached are the updated labels with the added sites and the logo notification we spoke about previously.

Best  
Jenny

*Jennifer J. Klika*  
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**From:** Benbow, Gene [<mailto:Benbow.Gene@epa.gov>]  
**Sent:** Tuesday, July 09, 2013 1:27 PM  
**To:** Jenny Klika  
**Subject:** 61282-49 data comp issue

Hi Jenny,

I received a call from Blake (Wilco) earlier about those few use sites and data comp. John and I looked over your source and *technically* you wouldn't qualify for formulator's exemption to add those uses. However, we understand that adding these sites falls into a gray area and we feel that with the use sites listed on your tech label (61282-13), you've met the data comp requirements for it.

If you would, please email me a clean label (the "after" version – no need for "before") with these use sites added and also whatever changes you were going to make by notification. We'll capture both at the same time.

Also, if you would please contact Blake and let him know about this that would be great. I don't want to send this email to him myself since I try to avoid discussing stuff like data comp between 2 registrants....I'd rather you guys communicate on it since it's obviously CBI.

Thanks – and sorry for the delay. I'll get you a label turned around ASAP once I hear back from you!

Gene Benbow  
Biologist, EPA  
Insecticides-Rodenticides Branch  
Registration Division  
<http://epa.gov/pesticides/>